

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

LUCAS HORTON

v.

SUNPATH, LTD.

§
§
§
§
§

CASE NO. 3:23-cv-631-E-BN

AGREED MOTION FOR ENTRY OF PROTECTIVE ORDER

LUCAS HORTON, Plaintiff, and SUNPATH, LTD., Defendant, file this their Agreed Motion for Entry of Protective Order, and would show this Honorable Court as follows.

1. The Court permitted for limited jurisdictional discovery to occur. Specifically, the Court permitted Plaintiff to “obtain through appropriate Federal Rule of Civil Procedure 34 requests any agreements between SunPath and the entities calling Horton in Texas.” ECF 16.

2. As required by the Court, the Parties meaningfully conferred on a Protective Order to govern the production of those documents and have agreed upon the general form of the Protective Order propounded by the Northern District of Texas.

3. The Parties request that the Court enter the Protective Order attached to this Motion.

Respectfully submitted,

By: /s/Lucas Horton*

Lucas Horton
lukeduke265@yahoo.com
1202 Stratford Drive
Richardson, Texas 75080
Telephone: (214) 909-3341

PLAINTIFF PRO SE

*by permission

By: /s/ Jason Wagner

Jason Wagner
State Bar No. 00795704
Federal Bar No. 20325
jwagner@jwagnerlaw.com
Two North Main Street
Kingwood, Texas 77339
Telephone: (713) 554-8450
Facsimile: (713) 554-8451
service@jwagnerlaw.com

ATTORNEYS FOR DEFENDANT

OF COUNSEL:

WAGNER LAW, PLLC

Two North Main Street
Kingwood, Texas 77339
Telephone: (713) 554-8450
Facsimile: (713) 554-8451

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **Agreed Motion to Enter Protective Order** was served, pursuant to Federal Rule of Civil Procedure 5, via ECF filing, on this the 14th day of August, 2023, to:

Lucas Horton
1202 Stratford Drive
Richardson, Texas 75080
(*Plaintiff Pro Se*)

/s/ Jason Wagner

Jason Wagner